

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

AUTOPARTSOURCE, LLC,

Plaintiff,

v.

Stephen C. Bruton, et al.,

and

BBH SOURCE GROUP,

Defendants.

Civil Action No. 3:13cv54-HEH

**SUPPLEMENTAL DECLARATION OF ROBYN SUZANNE GRAY IN SUPPORT
OF REQUEST FOR ATTORNEYS' FEES AND EXPENSES**

In accordance with the Memorandum Order (D.I. 24) entered on July 2, 2013, I, Robyn Suzanne Gray, hereby submit this Supplemental Declaration¹ and declare and state the following:

1. I am Counsel in the Richmond, Virginia office of the law firm McGuireWoods LLP. I am one of the attorneys responsible for this firms' representation of Plaintiff AutoPartSource LLC ("APS") in this matter and submit this Declaration in support of APS's request for attorneys' fees and expenses related to its Motion for Default Judgment.

2. I have had principal responsibility for coordinating the efforts of the McGuireWoods LLP attorneys who have represented APS throughout the course of the firm's

¹ The Supplemental Declaration is the same as the Declaration filed under seal on June 24, 2013, except to the extent noted in the footnotes herein.

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involvement in the litigation, including all aspects of APS's Complaint, Motion for Default Judgment and Memorandum in Support thereof, and other pleadings filed with this Court.

3. To properly identify and allocate time spent of work related to the investigation and litigation of APS's claim for misappropriation of trade secrets, I reviewed and analyzed the relevant time entries and expenses in McGuireWoods' billing records. These fees and expenses are based on contemporaneous time records that each timekeeper kept while working on various tasks relating to this litigation. Where time entries also included time entries irrelevant to the pending matter (i.e. related to Defendant Bruton's bankruptcy filing or claim for unemployment compensation), I determined how much time should be allocated to the pending matter based on either: 1) information in McGuireWoods' billing records; and/or 2) by instructing each timekeeper to perform the allocation in a conservative fashion, if applicable. I reviewed all time and expenses to ensure the reasonableness of hours submitted to the Court.

5. The following is pertinent biographical and rate information for the McGuireWoods' attorneys who assisted with the investigation and litigation of APS's Motion for Default Judgment:

A. Rodney A. Satterwhite

Rod Satterwhite is a litigator with 22 years of experience. Mr. Satterwhite graduated from the University of Virginia School of Law in 1991. Mr. Satterwhite has worked as a litigator in the McGuireWoods LLP Labor & Employment group for all 22 years of his career. In this capacity, he has tried cases as lead counsel in matters relating to trade secrets and non-competition issues in both state and federal courts. As a result of Mr. Satterwhite's experience,

he has received an "AV" rating from Martindale-Hubbell, the highest rating, and has been named in the *Best Lawyers in America* in the areas of Employment Law and Technology Law.

For 2013, the standard rate Mr. Satterwhite charged for his services was \$540 per hour, which is well within the range of customary fees charged by attorneys with similar levels of experience and expertise.

B. Robyn Suzanne Gray

I am a trial attorney with 13 years of experience. I graduated from Wake Forest School of Law in 1999, after which I clerked for the Honorable Judge J. Harry Michael, Jr. of the United States District Court for the Western District of Virginia, Charlottesville Division. Subsequently, I worked for five years at Christian & Barton, LLP developing general trial experience before joining McGuireWoods, LLP in the Richmond office in 2005 to specialize in Labor & Employment law. I have handled several employment cases involving a wide range of substantive issues such as employment discrimination, wrongful discharge, defamation, covenants not to compete and solicit, and trade secret theft. My practice further focuses on document discovery, representing corporate clients in the preservation, collection, review and production of electronic and paper documents.

For 2013, the standard rate I charged for my services was \$455 per hour, which is well within the range of customary fees charged by attorneys with similar levels of experience and expertise.

C. Micah B. Schwartz

Mr. Schwartz is a litigator with 5 years of experience. He graduated from the University of Virginia School of Law in 2008, after which he clerked for the Honorable David G. Trager, U.S. District Court Judge for the Eastern District of New York. He then joined the Washington,

D.C. law firm, Latham & Watkins, as an associate focusing on government contracts litigation and white collar defense. He joined McGuireWoods in the Richmond office in 2012 to specialize in Labor & Employment law. He represents clients in federal and state court at the trial and appellate level and counsels clients on labor and employment matters.

For 2013, the standard rate Mr. Schwartz charged for his services was \$350 per hour, which is well within the range of customary fees charged by attorneys with similar levels of experience and expertise.

D. Summer L. Speight

Ms. Speight recently joined the firm in September 2012. Prior to private practice, she served as law clerk to the Honorable M. Hannah Lauck of the U.S. District Court for the Eastern District of Virginia from 2010 to 2012 and the United States Attorneys Office in 2009. Ms. Speight graduated from the University of Richmond School of Law in 2009.

For 2013, the standard rate Ms. Speight charged for her services was \$295 per hour, which is well within the range of customary fees charged by attorneys with similar levels of experience and expertise.

6. The biographies for each of the above-listed lawyers, as they appear on the McGuireWoods LLP website, are attached hereto as Exhibit A.

7. In addition to the attorneys listed above, Senior Paralegal Kathy Walker, Senior and Reference Librarian Doris Morgan expended time assisting in the investigation and litigation of APS's claims.

8. All hours expended by McGuireWoods LLP professionals in the investigation and litigation of APS's misappropriation claims were reasonable, necessary and actually worked. In

my experience, the number of hours billed were reasonable based on the complexity of issues raised.

9. Attached hereto as Exhibit B is a spreadsheet providing the actual time entries for each of the McGuireWoods professionals listed above who billed time related to this litigation.²

10. Attached hereto as Exhibit C is a spreadsheet of the expenses actually incurred by McGuireWoods on behalf of APS as a result of the litigation.

11. Attached hereto as Exhibit D are the invoices for services rendered by Vestigant actually billed to APS. Vestigant forensically analyzed Defendant Bruton's APS-issued laptop after his termination.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of July, 2013.


ROBYN SUZANNE GRAY

² Pursuant to the Court's July 2, 2013 Memorandum Order, the time entries in Exhibit B have been redacted for attorney-client privilege and work product protection. While undertaking this task, we noted two time entries that had been duplicated due to an administrative error. We deleted the duplicate time entries and one other time entry that related more to APS's claims against Defendant Stephen Bruton than Defendant BBH. We further included fees incurred through June 30, 2013. As set forth in Exhibit B, the most recent total of attorneys' fees incurred is \$57,878.50.

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Partner

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Richmond, VA 23219-4030

PRACTICES

Labor and Employment
Trade Secrets

Rod tries employment and intellectual property cases in state and federal court. Most recently, he was trial counsel for DuPont in its trade secret litigation against Kolon Industries, in which the jury awarded DuPont \$919.9 million dollars. Best Lawyers in America has recognized Rod in the areas of Employment Law and Technology Law.

Focusing his practice on trade secret and noncompetition laws, federal employment discrimination laws and the Family and Medical Leave Act, he has litigated claims in state, federal and administrative courts, including the U.S. Courts of Appeal for the 1st, 2nd, 4th and 6th circuits. He has also represented corporate clients in responding to administrative charges filed with the Equal Employment Opportunity Commission (EEOC), and in managing investigations conducted by that agency. In this context, Rod advises clients on hiring and termination decisions, drafting and implementing employment policies, and guarding intellectual property through employment agreements and trade secret policies. In all of these areas, he prosecutes or defends client interests in court.

Also experienced with issues relating to technology in the workplace and the courtroom, Rod advises clients on the legal issues relating to information systems and technology in the workplace, among them issues such as e-mail, social media and Internet privacy. He also helps clients develop effective solutions to the growing risks and costs associated with document retention and electronic discovery. Having served as McGuireWoods Chief Counsel for Knowledge Management for five years, he combines an in-depth understanding of technology with sensitivity to unique business needs and cost concerns.

Rod also assists clients in the application of technology to litigation management. He participates in the design and development of extranets that enable improved attorney-client collaboration and communication in litigation and transactional work. As a litigator and a former technology consultant, he draws on his experience in both areas to bridge the gap between technology and the practice of law. He can counsel companies on ways to improve efficiency in the delivery of legal services, such as the implementation of case management and litigation support systems.

EXPERIENCE

Prior results do not guarantee a similar outcome. Results depend on a variety of factors unique to each case.

- Trial counsel for E.I. du Pont de Nemours and Company in federal trial involving theft of trade secrets by a competitor. After an eight-week trial, the jury returned a \$919 million dollar verdict for DuPont.
- Representation of international recruiting agency against employee claims of age discrimination, resulting in summary judgment in favor of our client, which was upheld after oral argument by the U.S. Court of Appeals for the Second Circuit.
- Representation of international beverage manufacturer in jury trial alleging race discrimination. At the close of the plaintiff's evidence, the Court entered judgment in favor of our client.
- Representation of beverage container manufacturer in defending against claims of

EXHIBIT

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Rodney A. Satterwhite

- wrongful termination under the Family and Medical Leave Act. Obtained summary judgment for employer, which was upheld after oral argument by the U.S. Court of Appeals for the Fourth Circuit. This was a case of first impression regarding the continuation of an employee's probationary status while on protected FMLA leave.
- Representation of cookie and cracker manufacturer in trade secrets claim against former employee and his new employer – a competitor of our client. After multi-day trial, obtained injunction against former employee and competitor prohibiting use or disclosure of our client's trade secrets.
 - Representation of railroad testing company against former director of technology and his new employer for theft of trade secrets. Despite the lack of a non-competition agreement, obtained an injunction that effectively precluded former employee from continuing to work for competitor.
 - Representation of financial services company in class action age discrimination claims relating to employee evaluation system. Obtained favorable settlement after discovery.
 - Representation of electronics manufacturer in trade secrets claims against former vice president. After multi-day evidentiary hearing, obtained injunction against former employee precluding work in restricted market, and precluding solicitation of our client's customers.

EDUCATION

- University of Virginia School of Law, JD, 1991
- The College of William & Mary, BA, cum laude, 1988

ADMISSIONS

- Virginia
- U.S. Court of Appeals for the 2nd Circuit
- U.S. Court of Appeals for the 4th Circuit
- U.S. Court of Appeals for the 6th Circuit
- U.S. District Court for the District of Colorado
- U.S. District Court for the Eastern District of Virginia
- U.S. District Court for the Western District of Virginia

HONORS

- Selected for inclusion in *The Best Lawyers in America*, Employment Law and Technology Law, Woodward/White, Inc., 2009-2013
- Senior Law Firm Technology Advisor, [The Center for Legal and Court Technology and Courtroom 21 Project](#), William & Mary School of Law, 2006-present
- Named to "Virginia Super Lawyers," Employment and Labor, Intellectual Property Litigation, Super Lawyers, Thomson Reuters, 2007-2013
- Named to "Virginia Legal Elite," Labor/Employment, *Virginia Business*, 2006, 2011

PUBLICATIONS

- Co-author, "[Don't Get Pushed Around: What Employers Should Do to Address](#)

Rodney A. Satterwhite

Bullying Behavior in the Workplace," *ACC Docket*, April 2010

- Author, "Record Retention Issues for Human Resources," *HR Advisor*, March/April 2008
- Author, "FMLA Rules up for Grabs," *Federal Employment Law Insider*, January 2007

AFFILIATIONS

- Member; Vice Chair, Special Committee on Information Technology, Virginia State Bar

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PRACTICES

Labor and Employment
Employment Litigation
Human Resources Compliance
Noncompetes, Trade Secrets and
Employee Fraud

INDUSTRIES

Financial Services
Education
Nonprofit and Tax-Exempt Organizations

Robyn's practice focuses primarily on representing employers on a full range of employment law matters, including such areas as employment discrimination, harassment and retaliation, wage and hour compliance, FMLA compliance, mass layoffs and shutdowns, restrictive covenants, wrongful discharge, and trade secret misappropriation. She also regularly counsels employers on numerous other employment matters. Robyn's clients encompass a wide range of businesses, including high tech companies, manufacturers, financial institutions, universities, hospitals and healthcare organizations, staffing agencies, insurance companies, political subdivisions and nonprofit organizations.

Robyn has litigated claims in federal and state courts arising under Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act, the Age Discrimination in Employment Act, the Family Medical Leave Act, the Fair Labor Standards Act, the Virginia Trade Secrets Act, and various tort and contract claims. She recently was the lead discovery counsel in a multimillion dollar trade secret case where over 100 trade secrets were at issue. She also represents employers before administrative agencies, including the Equal Employment Opportunity Commission, the Virginia Employment Commission, the Office of Civil Rights and the Virginia Fair Housing Office. In an alternative dispute context, she has litigated claims before the American Arbitration Association.

Recognizing the importance of avoiding litigation when possible, Robyn provides legal advice, guidance and training on employment issues, including hiring, disciplining and firing employees, conducting internal investigations, accommodating disabled employees, and protecting trade secrets and other confidential information. Robyn also conducts internal investigations and audits workplace policies and practices to provide advice and recommendations for compliance with applicable laws and avoidance of potential liability from high-risk practices. She advises employers on the implementation and enforcement of personnel policies, and reviews and drafts various employment agreements to protect her clients' business and legal interests.

Prior to joining McGuireWoods, Robyn was a litigation and labor and employment associate at a Richmond-based law firm. She also served as a law clerk to the Hon. James H. Michael of the U.S. District Court for the Western District of Virginia.

EXPERIENCE

Prior results do not guarantee a similar outcome. Results depend on a variety of factors unique to each case.

- Representation of E.I. du Pont de Nemours and Company in trade secret litigation which resulted in the finding of willful misappropriation by the defendant and a damages award of \$919.9 million after an eight-week jury trial.
- Representation of furniture manufacturer in on-site investigation and subsequent lawsuit filed by the Equal Employment Opportunity Commission.
- Representation of nationwide staffing agency in sexual harassment lawsuit.
- Counsel to universities, retailers, hospitals and nonprofit organizations on public

Robyn S. Gray

accommodation issues.

EDUCATION

- Wake Forest University School of Law, JD, 1999
- The Pennsylvania State University, BS, Human Development & Family Studies, 1996

ADMISSIONS

- Virginia
- U.S. Court of Appeals for the 4th Circuit
- U.S. District Court for the Eastern District of Virginia
- U.S. District Court for the Western District of Virginia

AFFILIATIONS

- Co-Chair, Richmond Domestic Violence Project, Sponsored by Young Lawyers Section, Virginia Bar Association, 2004-2011
- Chair, Kids in the Kitchen Committee, Junior League of Richmond, 2009-2010
- Chair, Children's Museum Committee, Junior League of Richmond, 2005-2006
- Member, Young Lawyers Executive Committee, 2005-2006; CLE Co-chair, 2004-2005, Richmond Bar Association
- Richmond Board Member, The Pennsylvania State University Alumni Association, 2000-2002
- Member, Virginia State Bar

McGUIREWOODS



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Associate

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PRACTICES

Labor and Employment
Employment Litigation
Labor-Management Relations
Noncompetes, Trade Secrets and
Employee Fraud

Micah is a litigator who focuses his practice on labor and employment law. He represents clients in federal and state court at the trial and appellate level and counsels clients on labor and employment matters.

Prior to joining the firm, Micah served as a litigation associate with an international law firm in Washington, D.C., focusing on government contracts litigation and white collar defense. He also served as a law clerk for the Honorable David G. Trager, U.S. District Court Judge for the Eastern District of New York.

EXPERIENCE

- Representation of global companies in wrongful termination lawsuits.
- Defended defense contractor in multi-billion dollar False Claims Act case, concluding in a successful motion to dismiss.
- Representation of automobile manufacturer in Freedom of Information Act and "Reverse FOIA" litigation.
- Conducted Foreign Corrupt Practices Act investigation into the foreign operations of multiple clients.
- Representation of pro bono clients before Social Security Administration and German Holocaust reparations boards.

EDUCATION

- University of Virginia School of Law, JD, 2008
- University of Virginia, BA, Political and Social Thought, 2003

ADMISSIONS

- District of Columbia
- Virginia
- U.S. Court of Appeals for the District of Columbia
- U.S. District Court for the District of Columbia

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PRACTICES

Labor and Employment

Summer counsels and represents employers in all aspects of employment-related litigation and traditional labor law.

She served as law clerk to the Honorable M. Hannah Lauck of the U.S. District Court for the Eastern District of Virginia from 2010 to 2012 and the U.S. Attorneys Office in 2009.

While earning her law degree from the University of Richmond, Summer was a member of the Walter Scott McNeill Law Society and received the CALI Award for Highest Grade in Civil Procedure, Constitutional Law, and Torts.

EDUCATION

- University of Richmond School of Law, JD, magna cum laude, Order of the Coif, Executive Editor, *Richmond Journal of Law and the Public Interest*, Senior Staff, *University of Richmond Law Review*, 2010
- James Madison University, BA, Political Science, BM, Music Performance, magna cum laude, 2006

ADMISSIONS

- Virginia
- U.S. Court of Appeals for the 4th Circuit
- U.S. District Court for the Eastern District of Virginia

AFFILIATIONS

Member, John Marshall American Inn of Court

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
1/15/2013	10283	Robyn S. Gray	1.30	591.50	Draft the complaint
1/16/2013	10283	Robyn S. Gray	1.80	819.00	Draft list of additional information to obtain from client; correspondence to and from client regarding additional information and computer exchange; conference with forensic examiner; review independent contract agreement
1/17/2013	10283	Robyn S. Gray	1.60	728.00	Correspondence to and from V. Poarch regarding additional information for the complaint; conference call with V. Poarch regarding complaint; review and revise complaint to incorporate new information
1/18/2013	10283	Robyn S. Gray	3.20	1,456.00	Conference with J. Amalfe regarding additional facts for complaint; review and revise complaint
1/22/2013	10283	Robyn S. Gray	3.50	1,592.50	Review and revise draft complaint; conference with S. Speight and Library Resources regarding [REDACTED]
1/22/2013	12201	Summer L. Speight	0.10	29.50	analyze decisions within the Fourth Circuit to [REDACTED]
1/22/2013	5851	Doris L. Morgan	0.80	184.00	research company information for BBH Source Group
1/23/2013	2409	Rodney A. Satterwhite	3.70	1,998.00	Revise complaint; multiple correspondence with C. Amalfe and J. Amalfe regarding same, [REDACTED]
					telephone conference with C. Amalfe regarding [REDACTED]

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**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
					related strategy issues; review
					preliminary results of forensic analysis;
					respond to C. Amalfe written questions
					regarding case strategy,
					etc.; revise second version of
					complaint
1/23/2013	10283	Robyn S. Gray	5.00	2,275.00	Conferences with paralegal regarding service of process and filing fees; Conference with forensic expert; analyze company documents and draft search terms; correspondence to and from forensic expert forwarding search terms;
					Conference with S. Speight regarding research; review and revise complaint
1/24/2013	10283	Robyn S. Gray	6.00	2,730.00	Research for draft complaint; review and revise complaint; conference call with forensic experts; review documents sent from forensic experts; Conference call with J. Amalfe and potential witnesses; review documents sent by forensic analyst
1/24/2013	2409	Rodney A. Satterwhite	2.80	1,512.00	Revise complaint; correspondence with C. Amalfe and J. Amalfe regarding results of forensic examination; telephone conference with J. Amalfe and others regarding forensic examination,
					and related strategy issues
1/25/2013	2409	Rodney A. Satterwhite	1.30	702.00	Review files deleted by Bruton on day of termination; correspondence with forensic

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
					investigator regarding same; review
					correspondence with client regarding filing
					complaint
1/25/2013	10283	Robyn S. Gray	5.00	2,275.00	Review and revise complaint; correspondence to
					and from forensic expert regarding Skype
					conversations and deletions; finalize complaint
					for filing; conference with J. Amalfe regarding
					revisions; review Skype conversations
1/27/2013	10283	Robyn S. Gray	2.20	1,001.00	Review and analyze Skype chats
1/28/2013	2409	Rodney A. Satterwhite	1.10	594.00	Review additional information from Skype
					transcripts; review correspondence regarding
					changes to and filing of complaint
1/28/2013	10283	Robyn S. Gray	3.70	1,683.50	Correspondence to and from forensic expert
					regarding Skype conversations; review
					additional Skype conversations; review and
					revise complaint to incorporate Skype
					conversations; correspondence to and from J.
					Amalfe regarding substance of Skype
					conversations; finalize filing for Court;
					correspondence to and from C. Amalfe regarding
					preservation letters
1/29/2013	2409	Rodney A. Satterwhite	0.50	270.00	Review additional Skype transcripts and
					correspondence with client regarding same
1/29/2013	10283	Robyn S. Gray	1.00	455.00	Conference with R. Satterwhite regarding
					strategy for [REDACTED] draft
					correspondence to client regarding next steps

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
1/30/2013	10283	Robyn S. Gray	1.10	500.50	Draft preservation letters to defendants; draft litigation hold memorandum
1/30/2013	2409	Rodney A. Satterwhite	0.60	324.00	Review questions from C. Amalfe regarding strategy and budget; revise correspondence regarding same
1/31/2013	12201	Summer L. Speight	0.30	88.50	review draft preservation notice and communicate with R. Gray regarding proposed change
1/31/2013	2409	Rodney A. Satterwhite	0.20	108.00	Review litigation hold memo and related correspondence
1/31/2013	10283	Robyn S. Gray	0.20	91.00	Finalize preservation letter and lit hold memo; correspondence to and from C. Amalfe regarding lit hold memo
2/4/2013	2409	Rodney A. Satterwhite	0.20	108.00	Correspondence to client regarding service of process and strategy for same [REDACTED]
2/5/2013	2409	Rodney A. Satterwhite	0.30	162.00	Revise litigation hold memorandum; receive and review email from C. Amalfe regarding service of process
2/5/2013	10283	Robyn S. Gray	1.00	455.00	Conference with forensic expert regarding analysis; correspondence to and from C. Amalfe regarding litigation hold memorandum and preservation letter; correspondence to and from K. Walker regarding service of process; revise preservation letter and litigation hold

AutoPartSource LLC
ATTORNEYS' FEES

Date	Initials	Name / Invoice Number	Hours	Amount	Description
					memorandum; correspondence to and from J. Bruton regarding litigation hold memorandum
2/7/2013	10283	Robyn S. Gray	1.00	455.00	Conference with J. Amalfe regarding litigation hold memorandum and expedited discovery; revise
					V. Poarch regarding litigation hold memorandum; conference call with V. Poarch regarding litigation hold memorandum; conference call with L. Smith regarding [REDACTED]
2/11/2013	12201	Summer L. Speight	2.40	708.00	analyze decisions on motion for expedited discovery; draft motion for expedited discovery; memorandum in support of motion for expedited discovery, requests for production to BBH, interrogatories to BBH, requests for production to Bruton, and interrogatories to Bruton
2/11/2013	10283	Robyn S. Gray	1.50	682.50	Review and revise expedited discovery and motion and memorandum for leave to file expedited discovery
2/13/2013	10283	Robyn S. Gray	0.50	227.50	Review and revise interrogatories to BBH; finalize pleadings; correspondence to and from J. Amalfe forwarding pleadings; calculate answer date and verify preservation letters received

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
2/14/2013	10283	Robyn S. Gray	0.50	227.50	Conference with R. Satterwhite regarding call from potential attorney; analyze extensions and dates for expedited discovery; draft correspondence to J. Amalfe outlining options and [REDACTED]
2/14/2013	2409	Rodney A. Satterwhite	0.50	270.00	Telephone conference with T. Brenner regarding request for extension on answer; analysis and correspondence to client regarding same
2/15/2013	2409	Rodney A. Satterwhite	0.30	162.00	Follow up telephone conference with T. Brenner regarding request for extension on answer; analysis and correspondence to client regarding same
2/20/2013	10283	Robyn S. Gray	0.40	182.00	Finalize expedited discovery motion and discovery; correspondence to and from J. Amalfe regarding expedited filing
2/20/2013	12201	Summer L. Speight	0.30	88.50	draft proposed order to accompany motion to expedite; contact clerk about certificate of service on proposed discovery
2/25/2013	2409	Rodney A. Satterwhite	0.10	54.00	Message from Judge's chambers regarding expedited discovery
2/25/2013	10283	Robyn S. Gray	0.10	45.50	Conference with Magistrate Judge's chambers regarding expedited discovery; conference with Clerk's Office regarding service papers
2/26/2013	10283	Robyn S. Gray	0.50	227.50	Confirm with Clerk's Office that No Answer was Filed; correspondence to and from R. Satterwhite regarding strategy of default

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
2/27/2013	10283	Robyn S. Gray	0.60	273.00	Confirm no filing in District Court; correspondence to and from client regarding default; conference with Magistrate Judge's chambers; research procedure for entry of default
3/1/2013	10283	Robyn S. Gray	1.20	546.00	Review Complaint to identify causes of actions against BBH; review case law regarding good cause for setting aside entry of default; analyze facts to support opposition to any motion to set aside; correspondence to and from R. Satterwhite summarizing standard and supporting facts; Conference with R. Satterwhite regarding strategy for default, and motion for relief of stay
3/4/2013	820	Kathleen A. Walker	1.10	302.50	review regulations regarding motion for default judgment and prepare affidavit to file with same
3/13/2013	10283	Robyn S. Gray	1.00	455.00	Strategize and draft summary of options for the client; review law review article on perfecting judgments; correspondence to and from S. Speight regarding research
3/19/2013	2409	Rodney A. Satterwhite	0.30	162.00	Receive and review order on motion for expedited discovery; follow up correspondence to client regarding status and strategy
3/25/2013	10283	Robyn S. Gray	0.40	182.00	Conference with M. Schwartz regarding default

AutopartSource LLC
ATTORNEYS' FEES

Date	Initials	Name / Invoice Number	Hours	Amount	Description
					Judgment motion
3/25/2013	12267	Micah B. Schwartz	0.40	140.00	Confer with R. Gray regarding matter and drafting of default judgment brief
3/27/2013	10283	Robyn S. Gray	2.20	1,001.00	Review correspondence from J. Amalfie regarding Bruton's [REDACTED] conference with R. Satterwhite regarding [REDACTED] option; draft correspondence to J. Amalfie outlining possible option [REDACTED]
					[REDACTED]
					research default judgment and permanent injunction; correspondence to and from R. Satterwhite regarding strategy for default judgment and [REDACTED]
3/27/2013	2409	Rodney A. Satterwhite	0.80	432.00	Multiple correspondence from client regarding Bruton [REDACTED] and analysis of legal theories for [REDACTED] review and revise MW responses to same
4/1/2013	12267	Micah B. Schwartz	1.20	420.00	Review complaint, motion for entry of default, and sample default judgment motions; begin memorandum in support of default judgment motion
4/2/2013	12267	Micah B. Schwartz	2.00	700.00	Research and draft memorandum in support of motion for default judgment; confer with R. Gray regarding same

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
4/3/2013	12267	Micah B. Schwartz	3.70	1,295.00	Research permanent injunction standard in default judgment context; draft motion for entry of default judgment and permanent injunction; confer with R. Gray regarding same
4/9/2013	10283	Robyn S. Gray	1.30	591.50	Review and revise memorandum for default judgment
4/14/2013	10283	Robyn S. Gray	2.00	910.00	Review documents to determine damages for matter; draft chart of damages; correspondence to and from C. Amalfe and J. Amalfe regarding damages estimate to date and additional information needed to determine damages
4/15/2013	10283	Robyn S. Gray	1.00	455.00	Calculate additional damages; correspondence to and from J. Amalfe and C. Amalfe regarding additional damages
4/16/2013	10283	Robyn S. Gray	1.80	819.00	Review pertinent documents, recalculate damages and identify proof; conference call with J. Amalfe regarding damages
4/17/2013	10283	Robyn S. Gray	1.80	819.00	Conference with V. Poarch regarding additional documents; correspondence to and from V. Poarch regarding additional documents to support damages; analyze additional documents and calculate lost profits and other damages; correspondence to and from R. Satterwhite and motion for default judgment
4/19/2013	10283	Robyn S. Gray	1.30	591.50	Review and revise memorandum in support of default judgment

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
4/22/2013	10283	Robyn S. Gray	3.00	1,365.00	Review and revise memorandum in support of default judgment; research pertinent case law
4/23/2013	10283	Robyn S. Gray	5.00	2,275.00	Review and revise memorandum in support of default judgment; research damage issues; conference with J. Amalfe regarding strategy for default judgment; draft declarations for default judgment memorandum
4/24/2013	10283	Robyn S. Gray	1.30	591.50	Draft declarations to support default judgment motion and damages
4/26/2013	10283	Robyn S. Gray	1.80	819.00	Review and revise default judgment memorandum and supporting declarations; draft declaration for Vestigant
4/29/2013	10283	Robyn S. Gray	0.30	136.50	Conference with paralegal regarding attorneys' fees summary; review and revise attorneys' fees declaration
4/30/2013	10283	Robyn S. Gray	0.30	136.50	Correspondence to J. Amalfe forwarding brief and declaration; correspondence to and from K. Cantwell regarding declaration
5/1/2013	10283	Robyn S. Gray	4.80	2,184.00	Draft skype exhibits for declaration; review and revise declarations; conference call with J. Amalfe; review correspondence from C. Amalfe and incorporate revisions; research damages issues; review documents provided by J. Amalfe to calculate damages; correspondence to and from V. Poarch seeking additional documents; conference with S. Speight regarding damages for default judgment

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
5/2/2013	10283	Robyn S. Gray	1.80	819.00	Review and revise declaration of J. Amalfe to include additional sources of damages and facts to support permanent injunction; conference with paralegals regarding attorneys' time entries for attorneys' fees award
5/3/2013	12201	Summer L. Speight	0.30	88.50	review draft memorandum in support of motion for default judgment
5/6/2013	12201	Summer L. Speight	3.60	1,062.00	analyze case law in the fourth circuit and Virginia on allowable damages [REDACTED]; revise draft memorandum in support of default judgment; analyze case law in the fourth circuit on production injunctions
5/6/2013	10283	Robyn S. Gray	1.30	591.50	Conferences with S. Speight regarding research for damages; correspondence to and from K. Cantwell regarding declaration; organize exhibits for memorandum and declarations
5/7/2013	10283	Robyn S. Gray	0.20	91.00	Conference call with S. Speight regarding default judgment damages and permanent injunction
5/7/2013	12201	Summer L. Speight	4.60	1,357.00	analyze cases discussing production injunctions; revise memorandum in support of motion for default judgment to seek a production injunction
5/8/2013	12201	Summer L. Speight	1.50	442.50	update memorandum in support of motion for

AutoPartSource LLC
ATTORNEYS' FEES

Date	Initials	Name / Invoice Number	Hours	Amount	Description
					default judgment to seek damages for recreation costs and to include a duration section for the production injunction
5/8/2013	10283	Robyn S. Gray	1.90	864.50	Review and revise memorandum for default judgment; Conferences with S. Speight regarding revisions; conference with J. Amalfe; review and revise J. Amalfe's declaration to include additional facts
5/9/2013	10283	Robyn S. Gray	1.00	455.00	Review and revise default judgment memorandum; correspondence to and from J. Amalfe regarding [REDACTED]
5/13/2013	10283	Robyn S. Gray	1.20	546.00	Correspondence to and from V. Poarch regarding W-2s; conference with paralegal regarding combining W-2s into a damages exhibit; calculate damages
5/14/2013	10283	Robyn S. Gray	1.00	455.00	Analyze W-2 information and add additional damages information to Amalfe Declaration and Memo in Support of Default Judgment
5/15/2013	10283	Robyn S. Gray	1.00	455.00	Review attorneys' fees and draft declaration; organize exhibits for J. Amalfe's declaration; revise Motion for Default Judgment to include additional damages
5/16/2013	10283	Robyn S. Gray	0.50	227.50	Correspondence to and from J. Amalfe and C. Amalfe regarding pleadings; draft explanation of damages; review correspondence from Court
5/16/2013	2409	Rodney A. Satterwhite	0.20	108.00	Receive and review letter from court clerk regarding instructions to proceed against BBH.

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
5/23/2013	10283	Robyn S. Gray	2.80	1,274.00	Conference call with J. Amalfe regarding declarations and pleadings; review and revise memorandum for default judgment; organize exhibits; verify correct citations; review and revise declaration for attorneys' fees based on fees to date; finalize brief for filing
6/10/2013	10283	Robyn S. Gray	0.50	227.50	Conference with R. Satterwhite regarding hearing; confirm with Clerk's Office no response filed; correspondence to and from client regarding hearing dates and analysis of request by Court
5/29/2013	10283	Robyn S. Gray	0.10	45.50	Correspondence forwarding pleadings to J. Amalfe and advising of upcoming deadlines
6/4/2013	2409	Rodney A. Satterwhite	0.40	216.00	Telephone conference with opposing counsel regarding effect of stay on motion for default; analysis of same
6/10/2013	2409	Rodney A. Satterwhite	0.40	216.00	Telephone conference with court regarding hearing on default
6/25/2013	2409	Rodney A. Satterwhite	0.70	378.00	Review memo in support of motion for default in preparation for evidentiary hearing.
6/26/2013	10283	Robyn S. Gray	0.10	45.50	Confirm service of process; review order to verify whether proof of service should be filed
6/27/2013	10283	Robyn S. Gray	4.60	2093.00	Draft affidavit in support of attorneys' fees; correspondence to and from L. Jacob regarding review of time entries for attorneys' fees;

**AutoPartSource LLC
ATTORNEYS' FEES**

Date	Initials	Name / Invoice Number	Hours	Amount	Description
					draft supplemental memorandum in support of
					attorneys' fees; review attorneys' fees to
					include only those related to misappropriation
6/28/2013	820	Kathleen A. Walker	1.80	495.00	cite check brief and prepare exhibits
6/28/2013	10283	Robyn S. Gray	2.70	1228.50	Correspondence to and from L. Jacobs regarding
					declaration and time entries; draft summary of
					attorneys' experience for L. Jacobs; organize
					exhibits; review and revise costs to include
					only those related to misappropriation;
					finalize memorandum
					to file with Court
6/28/2013	2409	Rodney A. Satterwhite	0.80	432.00	Review and revise supplemental brief on default motion
				57,878.50	

AutoPartsSource LLC

Costs

Date	Name / Invoice Number	Quantity	Rate	Amount	Description
1/23/2013	Robyn S. Gray	1	350	350	CLERK OF THE US DISTRICT COURT UNITED STATES
					DISTRICT COURT - Filing fee for Complaint Inv#
					012313 Date: 01/23/2013
					Vendor=Clerk, U.S. District Court Balance= .00 Amount=
				350	
					Check #502458 01/23/2013
1/25/2013	Karen L. Southall	117	0.1	11.7	Copy Charges
2/5/2013	Karen L. Southall	73	0.1	7.3	Copy Charges
2/5/2013	Rodney A. Satterwhite	1	16.71	16.71	FedEx Priority Overnight to HAYWARD CA
					#: 794684470569
					Vendor=Federal Express Balance= .00 Amount= .00
					Check #PSS4147 02/15/2013
2/5/2013	Rodney A. Satterwhite	1	12.35	12.35	FedEx Priority Overnight to MECHANICSVI
					Tracking #: 794684644074
					Vendor=Federal Express Balance= .00 Amount= .00
					Check #PSS4147 02/15/2013
2/6/2013	Karen L. Southall	35	0.1	3.5	Copy Charges
2/6/2013	Rodney A. Satterwhite	1	41.28	41.28	FedEx International Priority/FedEx
					International to GUANGDONG PROVINCE CHINA CN
					Tracking #: 794689255933
					Vendor=Federal Express Balance= .00 Amount= .00
					Check #PSS4206 03/08/2013
2/6/2013	Rodney A. Satterwhite	1	0.3	0.3	Pacer Research
2/8/2013	Karen L. Southall	20	0.1	2	Copy Charges

EXHIBIT

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AutoPartsSource LLC

Costs

2/11/2013	Karen L. Southall	6	0.1	0.6	Copy Charges	
2/11/2013	Rodney A. Satterwhite	1	0.1	0.1	Pacer Research	
2/14/2013	Karen L. Southall	25	0.1	2.5	Copy Charges	
2/18/2013	Catherine A. Daley	1	26	26	JW LOGISTICS LLC/BIZPORT/JW LOGISTICS - De to USDC from McGuireWoods (Robyn Gray) on 1/28/13 - Roundtrip Dedicated Delivery Inv# 7410 Date: 02/03/2013 Vendor=JW Logistics LLC Balance= .00 Amount= 423.82 Check #504838 02/20/2013	
2/20/2013	Karen L. Southall	121	0.1	12.1	Copy Charges	
2/28/2013	Karen L. Southall	1	0.1	0.1	Copy Charges	
3/1/2013	Rodney A. Satterwhite	1	50	50	Computer Research - Lexis by Robyn Gray	
3/4/2013	Catherine A. Daley	1	8	8	Action Logistics - Delivery to USDC (Judge Hudson) from McGuireWoods (Robyn Gray) on 2/20/13 - Delivery Inv# 1057 Date: 02/24/2013 Vendor=Action Logistics LLC Balance= .00 Amount= 324.28 Check #505892 03/04/2013	
3/4/2013	Karen L. Southall	58	0.1	5.8	Copy Charges	
3/5/2013	Karen L. Southall	40	0.1	4	Copy Charges	
3/8/2013	Rodney A. Satterwhite	1	63.32	63.32	JW LOGISTICS LLC/BIZPORT/JW LOGISTICS - of process of Complaint on Defendants Inv# 7683 Date: 02/10/2013	

Costs

						Vendor=JW Logistics LLC Balance= .00 Amount= 63.32
						Check #506440 03/11/2013
3/13/2013	Rodney A. Satterwhite	1	0.3	0.3		Pacer Research
3/14/2013	Catherine A. Daley	1	15.63	15.63		RICHMOND EXPRESS COURIER SERVICE/RICHMOND EXPRESS INC - Delivery to McGuireWoods (Robyn Gray) from USDC on 1/29/13 - Direct Delivery Inv# 57725 Date: 02/05/2013
						Vendor=Richmond Express Inc Balance= .00 Amount= 471.93
						Check #507058 03/15/2013
3/25/2013	Rodney A. Satterwhite	1	0.4	0.4		Pacer Research
3/25/2013	Rodney A. Satterwhite	1	2.5	2.5		Pacer Research
3/26/2013	Catherine A. Daley	1	8.93	8.93		RICHMOND EXPRESS COURIER SERVICE/RICHMOND EXPRESS INC - Delivery to USDC (Judge Hudson) from McGuireWoods (Robyn Gray) on 3/5/13. Inv# 57793 Date: 03/19/2013
						Vendor=Richmond Express Inc Balance= .00 Amount= 376.50
						Check #508047 03/27/2013
3/29/2013	Rodney A. Satterwhite	1	1.8	1.8		Pacer Research
4/9/2013	Rodney A. Satterwhite	1	2	2		Computer Research - Lexis by Robyn Gray
5/13/2013	Karen L. Southall	3	0.1	0.3		Copy Charges
5/23/2013	Karen L. Southall	238	0.1	23.8		Copy Charges
5/23/2013	Robyn S. Gray	1	28.41	28.41		FedEx Priority Overnight to Hayward, CA Tracking #: 799839325145

AutoPartsSource LLC

Costs

							Vendor=Federal Express Balance= .00 Amount= .00
							Check #PSS4517 05/28/2013
5/23/2013	Robyn S. Gray	1	13.79	13.79			FedEx Priority Overnight to Midlothian, VA
							Tracking #: 799839455953
							Vendor=Federal Express Balance= .00 Amount= .00
							Check #PSS4518 05/28/2013
5/24/2013	Karen L. Southall	183	0.1	18.3			Copy Charges
6/4/2013	Catherine A. Daley	1	6.5	6.5			ACTION LOGISTICS LLC - Delivery to USDC (J Henry Hudson) from McGuireWoods (Robyn Gray) on 5/24/13 Inv# 2365 Date: 05/26/2013
							Vendor=Action Logistics LLC Balance= .00 Amount= 459.07
							Check #514493 06/05/2013
6/18/2013	Karen L. Southall	126	0.1	12.6			Copy Charges
6/19/2013	Karen L. Southall	364	0.1	36.4			Copy Charges
6/19/2013	Robyn S. Gray	1	13.08	13.08			FedEx Priority Overnight to SACRAMENTO CA US
							Tracking #: 796036226447
							Vendor=Federal Express Balance= .00 Amount= .00
							Check #PSS4616 06/28/2013
6/19/2013	Robyn S. Gray	1	16.57	16.57			FedEx Priority Overnight to HAYWARD CA US
							Tracking #: 796039710256
							Vendor=Federal Express Balance= .00 Amount= .00
							Check #PSS4616 06/28/2013
6/19/2013	Robyn S. Gray	1	12.24	12.24			FedEx Priority Overnight to MIDLOTHIAN VA US
							Tracking #: 796040307701
							Vendor=Federal Express Balance= .00 Amount= .00
							Check #PSS4616 06/28/2013

AutoPartsSource LLC

Costs

6/24/2013	Karen L. Southall	214	0.1	21.4	Copy Charges
				852.61	



Invoice

McGuireWoods, LLP
Attn: Robbi Gray, Esq.
901 E. Cary Street
Richmond VA 23219

Invoice #
10797

June 01, 2013

Client ID: 0109.0029

In reference to: Auto Parts Solutions

Page 1

Total fees	\$400.00
Total expenses	\$0.00
Interest	\$0.00
Administrative Fee	\$12.00
Current Invoice Amount	\$412.00

See following pages for billing detail and Total Outstanding Balance

Vestigant, LLC
PO Box 23
McLean, VA 22101-0023

202-905-2170

EXHIBIT

D

Invoice

Client ID: 0109.0029

Page 2

Professional Services

<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
5/1/2013	Declaration	\$400.00	1.00	\$400.00

For professional services rendered \$400.00

Administrative Fee \$12.00

Total amount of this bill \$412.00

Previous balance \$6,533.35

Total Outstanding Balance**\$6,945.35**

Please remit payment to: Vestigant, LLC, P.O. Box 23, McLean, VA 22101-0023

Please notify us if your contact information has changed.

McGuireWoods, LLP
Attn: Robbi Gray, Esq.
Richmond, VA 23219

Vestigant, LLC
PO Box 23
McLean, VA 22101-0023

202-905-2170